

5 Feb 02

Response to Comments Your Ltd dtd 6 Jan 02

To: Robert Beckwirth

From: Dan Fleming

First off, my original comments were dated 29 Jan 02 so your date of 6 Jan 02 is somewhat off.

GENERAL COMMENTS

1. This report is missing significant information that is integral to the report. My comment that this be a stand-alone report would include this information. I stand by my original comment that general information related to historical information is missing. This missing information is necessary to support decisions/conclusions that you make within the report and which would allow the reviewer to fully understand where this project is at and why.

2. The addition of the time line would significantly enhance the report.

3. You have missed the point. I'm not talking about field screening. The use of a PID or FID allows for a semi-quantitative evaluation of current site conditions and does not represent definitive laboratory data. The screening levels I'm referring to deal directly with some standard that you compare actual laboratory data to determine if there are any exceedences that would require further investigations and/or possible remedial action. What are you comparing, or have you compared historical/current data to; residential, industrial/commercial, recreational? These 'screening values', are they TACO, Region IX PRGs, a combination of these, or something else? If you have not screened them against some standard, then how do you know there is an issue?

4. Noted and agreed.

5/6. Noted and agreed. What is your definition of 'general extent of soil contamination?' Has the Agency stated that soil contamination at this site is fully delineated? If so, please provide me with a copy of the letter....other wise, the soil contamination has not been fully delineated. ECO/HHRA refers to an Ecological and Human Health Risk Assessment. I agree that DNAPLS generally seek depth to the extent the local geology allows...however, do you have definitive laboratory data that supports your conclusions?

SPECIFIC COMMENTS

7. Is the term ELUC recognized by the state and legally defined by the State?

8. Noted

9. Using the terms 'believes' and 'probably' does not give one confidence that the contamination is fully defined. I do not want to get to the end where we expect to obtain Agency closure and find out that additional testing is required to fully define extent of contamination. How does a restriction for the use of groundwater ('ELUC') eliminate the need for LTM and confirm or deny contaminant migration?

10. Noted (I miss read the info)

11. Yes, if you have a copy of this letter (and any others), I would appreciate a copy. I still require that the date of Agency Closure Plan approval be stated in the report.

12. I agree. This represents background info that should be included in the report so that the reviewer does not have to speculate as to what was originally tested and what was agreed upon for follow-on investigations. I was not inferring that other COC's required investigation....just the justification for the ones currently under investigation.

13. Noted....(see RTC #12, the same logic is applicable here)

14. Disagree. You have no supportive documentation to support this claim. Unless you have a Class II classification for this site, you cannot rule out Class I. Furthermore, the Agency has always taken the more conservation approach when site conditions have not been fully established and in this situation, Class I standards apply.

15. Since I am the project manager, I request that in the future, any deviations from the approved plan be discussed with me prior to initiation of field activities.

16. Disagree. Your comment that the Agency agrees 'that the general extent of soil contamination has been delineated' is not the same as having actual knowledge (and being able to support with definitive laboratory data) the vertical and horizontal extent of contamination. I have seen no documentation that the Agency has stated this as fact nor that further delineation of soil contamination is not warranted. As I stated in my RTC #3, I ask the same question...What standards are you comparing your results against?

17. You are not responding to my question. Do you know the vertical extent of the contamination at this location? This location represents a potential source for continual contamination of groundwater. As it relates to your response, I do not have confidence in your conclusion. The original location for the source was under Bldg 105 and it now appears to be outside of the footprint on the east side of the facility. What site-specific data do you have supporting your statement related to lateral migration being very slow? What 'sand are you referring to? Is this a sand lense and if so, where does it go? What are the percent fines for the sand lense? What is the hydraulic conductivity at this location? Is there an aquifer located directly beneath this location? I ask this last question since I'm not sure what your concern is related to allowing the contamination to travel deeper faster. Based on my knowledge of the geology for northern Illinois, the nearest aquifer is significantly deeper than 12-ft and I would not worry about potential

contamination. And finally, what definitive laboratory data do you have to support that you used 'the most contaminated soil sample' for testing?

18. Please see my RTC #3/16.

19/20. Yes, I would like to see overlays.

21. This information is nowhere in the text. I would strongly recommend that you attempt to simplify the identification to eliminate the confusion.